

#### Indiana Department of Environmental Management

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan Governor

Lori F. Kaplan Commissioner

January 16, 2004

100 North Senate Avenue P.O. Box 6015 Indianapolis, Indiana 46206-6015 (317) 232-8603 (800) 451-6027 www.in.gov/idem

TO: Interested Parties / Applicant

RE: Heartland Automotive, LLC / SPM 133-18195-00027

FROM: Paul Dubenetzky

Chief, Permits Branch Office of Air Quality

#### Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, within eighteen (18) days of the mailing of this notice. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- the date the document is delivered to the Office of Environmental Adjudication (OEA); (1)
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3)The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit. decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- the name and address of the person making the request; (1)
- (2) the interest of the person making the request;
- identification of any persons represented by the person making the request; (3)
- the reasons, with particularity, for the request; (4)
- the issues, with particularity, proposed for considerations at any hearing; and (5)
- identification of the terms and conditions which, in the judgment of the person making the request, (6) would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.



Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency 401 M Street Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.



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January 16, 2004

Mr. Lou Gudino Heartland Automotive, LLC P.O. Box 648 Greencastle, Indiana 46135-0648

> Re: 133-18195

> > Third Significant Permit Modification to Part 70 No.: T 133-12495-00027

Dear Mr. Gudino:

Heartland Automotive, LLC was issued a Part 70 Operating Permit (T 133-12495-00027) on June 14, 2001, for a plastic automotive parts surface coating source. A letter requesting changes to this permit was received on September 19, 2003. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the operation of two (2) additional spray booths (WSB-1 and WSB-2) and the incorporation of the recently promulgated National Emission Standard for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products (40 CFR 63, Subpart PPPP). The changes in the Part 70 Operating Permit are documented in the Technical Support Document. All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire revised Title V Operating Permit, with all modifications and amendments made to it, is being provided.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Edward A. Longenberger, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 ext. 20 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Original signed by Paul Dubenetzky Paul Dubenetzky, Chief Permits Branch Office of Air Quality

Attachments EAL/MES

File - Putnam County

U.S. EPA, Region V

Putnam County Health Department

Air Compliance Section Inspector - Jim Thorpe

Compliance Branch - Karen Ampil



companyname city, Indiana Permit Reviewer: XXX/MES Page 2 of 2 OP No. F

Administrative and Development Technical Support and Modeling - Michelle Boner



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## PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

# Heartland Automotive, LLC 300 South Warren Drive Greencastle, Indiana 46135

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 133-12495-00027	
Original signed by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 14, 2001 Expiration Date: June 14, 2006

First Significant Source Modification No.: SSM 133-13901-00027, issued July 13, 2001 First Significant Permit Modification No.: SPM 133-14515-00027, issued August 30, 2001 Second Significant Source Modification No.: SSM 133-15489-00027, issued June 11, 2002 Second Significant Permit Modification No.: SPM 133-15759-00027, issued June 26, 2002 First Minor Source Modification No.: MSM 133-18004-00027, issued November 25, 2003

Third Significant Permit Modification No. 133-18195-00027		Pages Affected: 5, 25 - 30, and 39	
	Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:January 16, 2004	

Heartland Automotive, LLC Greencastle, Indiana Permit Reviewer: EAL/MES Third Significant Permit Modification No.133-18195-00027 Revised by: EAL/MES Page 2 of 51 OP T 133-12495-00027

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#### **SECTION A**

#### SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

#### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary plastic automotive parts surface coating source.

Responsible Official: Soji Honma

Source Address: 300 South Warren Drive, Greencastle, Indiana 46135

Mailing Address: P.O. Box 648, Greencastle, Indiana 46135

General Source Phone Number: (765) 653-4263
SIC Code: 3089, 3999
County Location: Putnam

Source Location Status: Attainment for all criteria pollutants

Source Status: Part 70 Permit Program

Minor Source, under PSD Rules;

Major Source, Section 112 of the Clean Air Act

## A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) door panel assembly line, identified as VF/EF/HS, consisting of three (3) processes, vacuum forming, exhausted through Stack C-1, edge folding, exhausted through Stack C-2, both installed in May 1989, and hot stake, exhausted through Stack C-3, installed in February 1999, capacity: 150 door panels per hour.
- (b) Two (2) surface coating booths, identified as SB-1 and SB-2, installed in 1999, equipped with HVLP spray applicators and dry filters for PM overspray control, exhausted through Stacks SB-1 and SB-2, capacity: 62.5 plastic automotive parts per hour.
- (c) Two (2) surface coating booths, identified as WSB-1 and WSB-2, equipped with HVLP spray applicators and a water curtain for PM overspray control, exhausted through Stack WS-1, capacity: 33 plastic instrument panels per hour.
- (d) One (1) adhesive application booth, identified as AB-1, installed in 2000, equipped with HVLP spray applicators and dry filters for PM overspray control, exhausted through Stack C-4, capacity: 250 plastic automotive parts per hour.
- (e) One (1) touch-up paint booth, identified as TPB exhausted through Stack D, installed in 1997, capacity: 13.89 plastic automotive parts per hour.
- (f) One (1) surface coating line, with a capacity of 57.7 vehicles per hour, consisting of three (3) spray booths in series, using high-volume low-pressure (HVLP) spray equipment, equipped with a wet scrubber for overspray control and exhausting to Stacks S-4 through S-7.

Heartland Automotive, LLC Greencastle, Indiana Permit Reviewer: EAL/MES Third Significant Permit Modification No.133-18195-00027 Revised by: EAL/MES Page 8 of 51 OP T 133-12495-00027

- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):
  - (a) One (1) natural gas fired boiler, identified as B-1, installed in 1989, exhausting to Stack B, rated at 1.36 million British thermal units per hour. [326 IAC 6-2-4]
  - One (1) slush mold/powder slush operation, identified as SM/PS. [326 IAC 6-3-2] (b)

#### A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

Heartland Automotive, LLC

Permit Reviewer: EAL/MES

Greencastle, Indiana

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

#### **SECTION B**

#### **GENERAL CONDITIONS**

#### B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

#### B.2 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

#### B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

#### B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

#### B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

#### B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

#### B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

#### B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

#### B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

#### B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015 United States Environmental Protection Agency, Region V Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification:
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

#### B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - Ouring the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or

#### facsimile to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury

to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

#### B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408 (a) of the Clean Air Act; and

- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

#### B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

#### B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
  - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

- B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]
  - (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
  - (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
    - (1) That this permit contains a material mistake.
    - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
    - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

#### B.17 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
  - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

  If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)] If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

#### B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

## B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

#### B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:

Indiana Department of Environmental Management

Permits Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20 (b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
  - (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
  The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]

  The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

#### B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

#### B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

#### B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425

Heartland Automotive, LLC Greencastle, Indiana Permit Reviewer: EAL/MES Third Significant Permit Modification No.133-18195-00027 Revised by: EAL/MES Page 22 of 51 OP T 133-12495-00027

(ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

#### **SECTION C**

#### **SOURCE OPERATION CONDITIONS**

**Entire Source** 

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

#### C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

#### C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

#### C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

#### C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

#### C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are

mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management Asbestos Section, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
  - The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
  The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior
  to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly
  inspect the affected portion of the facility for the presence of asbestos. The requirement that
  the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally
  enforceable.

#### Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling

Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

#### Compliance Requirements [326 IAC 2-1.1-11]

#### C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

#### Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

#### C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

#### C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

#### Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

#### C.12 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### C.13 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
    - (A) Reasonable response steps that may be implemented in the event that

- compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
- (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

#### C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

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- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6] [326 IAC 2-7-19 (e)]
  - (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements and be used for the purpose of a Part 70 fee assessment:
    - (1) Indicate estimated actual emissions of criteria pollutants from the source;
    - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
  - (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management Technical Support and Modeling Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

#### C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

#### C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

#### **Stratospheric Ozone Protection**

#### C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

#### **SECTION D.1**

#### **FACILITY OPERATION CONDITIONS**

#### Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) door panel assembly line, identified as VF/EF/HS, consisting of three (3) processes, vacuum forming, exhausted through Stack C-1, edge folding, exhausted through Stack C-2, both installed in May 1989, and hot stake, exhausted through Stack C-3, installed in February 1999, capacity: 150 door panels per hour.
- (b) Two (2) surface coating booths, identified as SB-1 and SB-2, installed in 1999, equipped with HVLP spray applicators and dry filters for PM overspray control, exhausted through Stacks SB-1 and SB-2, capacity: 62.5 plastic automotive parts per hour.
- (c) Two (2) surface coating booths, identified as WSB-1 and WSB-2, equipped with HVLP spray applicators and a water curtain for PM overspray control, exhausted through Stack WS-1, capacity: 33 plastic instrument panels per hour.
- (d) One (1) adhesive application booth, identified as AB-1, installed in 2000, equipped with HVLP spray applicators and dry filters for PM overspray control, exhausted through Stack C-4, capacity: 250 plastic automotive parts per hour.
- (e) One (1) touch-up paint booth, identified as TPB exhausted through Stack D, installed in 1997, capacity: 13.89 plastic automotive parts per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.1.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 12 to 40 CFR Part 63, Subpart PPPP] [40 CFR 63.2398]
  - (a) The provisions of 40 CFR Part 63, Subpart A General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart PPPP. The Permittee must comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products.
  - (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- D.1.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482]
  - (a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at http://www.epa.gov/ttn/atw/plastic/plasticpg.html. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after the date 3 years after the effective date of 40 CFR Part 63, Subpart PPPP.

- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:
  - (1) All coating operations as defined in 40 CFR 63.4581;
  - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, which are incorporated by reference.

#### D.1.3 Volatile Organic Compounds [326 IAC 8-1-6]

- (a) Pursuant to 326 IAC 8-1-6, Best Available Control Technology (BACT) for the four (4) surface coating booths (WSB-1, WSB-2, SB-1 and SB-2) has been determined to be:
  - (1) The total VOC delivered to the applicators, including coatings, dilution solvents, and cleaning solvents, shall be limited to less than 49.0 tons per twelve (12) consecutive month period;
  - The method of application at the four (4) surface coating booths (WSB-1, WSB-2, SB-1 and SB-2) shall be performed with high volume-low pressure (HVLP) spray applicators or the equivalent; and
  - (3) The following management and work practices shall apply:
    - (A) Operator training course.
    - (B) Spray gun cleaning.
    - (C) The cleanup solvent containers used to transport solvent from drums/ containers to work stations be closed containers having soft gasketed closures.
    - (D) The application equipment operators shall be instructed and trained on the methods and practices utilized to minimize spillage on the floor and over application.
    - (E) Storage containers used to store VOC containing materials shall be kept covered when not in use.

- (F) Cleanup solvents will be reused in the process as much as possible to reduce hazardous waste and the related impact on the environment.
- (b) Any change or modification which would increase the potential to emit VOC from the adhesive application booth, known as AB-1, to twenty-five (25) tons per year or more, shall obtain prior approval from IDEM, OAQ.

## D.1.4 HAPs [326 IAC 2-4.1-1]

- (a) The total amount of any single HAP and combination of HAPs delivered to the applicators of the two (2) surface coating booths (SB-1 and SB-2) shall be limited to less than ten (10) and less than twenty-five (25) tons per twelve (12) consecutive month period respectively. Therefore, the requirements of 326 IAC 2-4.1-1 (New source toxics control) do not apply.
- (b) Any change or modification which would increase the potential to emit a single HAP or a combination of HAPs from the adhesive application booth, known as AB-1, or the two (2) spray booths (WSB-1 and WSB-2) to ten (10) tons per year or more or twenty-five (25) tons per year or more, respectively, shall obtain prior approval from IDEM, OAQ.

## D.1.5 Particulate Matter (PM) [326 IAC 6-3-2]

The PM from the door panel assembly line (VF/EF/HS), the touch-up paint booth (TPB), the adhesive application booth (AB-1), the two (2) surface coating booths (WSB-1 and WSB-2), and the two (2) surface coating booths (SB-1 and SB-2) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$  where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

## D.1.6 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the adhesive application booth (AB-1), the two (2) surface coating booths (WSB-1 and WSB-2), the two (2) surface coating booths (SB-1 and SB-2) and any control devices.

### **Compliance Determination Requirements**

## D.1.7 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

Compliance with the VOC and HAPs usage limitations contained in Conditions D.1.3 and D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

## D.1.8 VOC Emissions

Compliance with Condition D.1.3 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

## D.1.9 HAPs Emissions

Compliance with Condition D.1.4 shall be demonstrated within 30 days of the end of each month based on the HAPs usage for the most recent twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

## D.1.10 Particulate Matter (PM)

- (a) In order to comply with Condition D.1.5, the dry filters for PM overspray control shall be in operation at all times when the adhesive application booth (AB-1) and the two (2) surface coating booths (SB-1 and SB-2) are in operation.
- (b) In order to comply with Condition D.1.5, the water curtain for PM overspray control shall be in operation at all times when the two (2) surface coating booths (WSB-1 and WSB-2) are in operation.

## D.1.11 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks C-4, WS-1, SB-1 and SB-2 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C Compliance Monitoring Plan Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C Compliance Monitoring Plan Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) The Permittee shall record the flow rate of the water curtain at least once per shift when the one (1) surface coating line is in operation. When for any one reading, the flow rate of the water curtain is outside the normal range of 190 and 232 gallons of water per minute or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Monitoring Plan Failure to Take Response Steps. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C Compliance Monitoring Plan Failure to Take Response Steps, shall be considered a violation of this permit.
- (d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

## Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

## D.1.12 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.3 (a) and (b) and D.1.4 (a) and (b), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and usage requirements and/or the VOC and HAPs emission limits and emission requirements established in Conditions D.1.3 and D.1.4.
  - (1) The amount of VOC in each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to

verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

- (2) A log of the dates of use;
- (3) The cleanup solvent usage for each month;
- (4) The total VOC usage for each month; and
- (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Conditions D.1.10 and D.1.11, the Permittee shall maintain once per shift records of the water curtain flow rate, a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

## D.1.13 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.3(a) and D.1.4(a) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## D.1.14 Notification Requirements [40 CFR 63.4510]

- (a) <u>General.</u> You must submit the notifications in 40 CFR 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to you by the dates specified in those sections, except as provided in paragraphs (b) and (c) of this section.
- (b) Initial notification. You must submit the initial notification required by 40 CFR 63.9(b) for a new or reconstructed affected source no later than 120 days after initial startup or 120 days after the effective date of 40 CFR Part 63, Subpart PPPP, whichever is later. (For an existing affected source) you must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart PPPP. If you are using compliance with the Automobiles and Light-Duty Trucks NESHAP (subpart IIII of this part) under 40 CFR 63.4881(d) to constitute compliance with this subpart for your plastic part coating operations, then you must include a statement to this effect in your initial notification and no other notifications are required under this subpart. If you are complying with another NESHAP that constitutes the predominant activity at your facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for your plastic coating operations, then you must include a statement to this effect in your initial notification and no other notifications are required under this subpart.
- (c) Notification of compliance status. You must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to your affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510, paragraphs (c)(1) through (11) and in 40 CFR 63.9(h).

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than twenty-seven months after the effective date of 40 CFR 63, Subpart PPPP.
- (c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

## **SECTION D.2**

### **FACILITY OPERATION CONDITIONS**

## Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities

- (a) One (1) natural gas fired boiler, identified as B-1, installed in 1989, exhausting to Stack B, rated at 1.36 million British thermal units per hour.
- (b) One (1) slush mold/powder slush operation, identified as SM/PS.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

## Emission Limitations and Standards [326 IAC 2-7-5(1)]

## D.2.1 Particulate Matter (PM) [326 IAC 6-2-4(a)]

Pursuant to 326 IAC 6-2-4(a) (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the one (1) natural gas fired boiler, identified as B-1, rated at 1.36 million British thermal units per hour, shall be limited to 0.6 pounds per million British thermal units.

## D.2.2 Particulate Matter (PM) [326 IAC 6-3-2]

The PM emissions from the one (1) slush mold/powder slush operation, identified as SM/PS, shall not exceed 0.551 pounds per hour when operating at a process weight rate of 100 pounds per hour.

This limitation is based on the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$  where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

#### **SECTION D.3**

#### **FACILITY OPERATION CONDITIONS**

## Facility Description [326 IAC 2-7-5(15)]:

One (1) surface coating line, with a capacity of 57.7 vehicles per hour, consisting of three (3) spray booths in series, using high-volume low-pressure (HVLP) spray equipment, equipped with a wet scrubber for overspray control and exhausting to Stacks S-4 through S-7.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

## Emission Limitations and Standards [326 IAC 2-7-5(1)]

## D.3.1 Volatile Organic Compounds [326 IAC 8-1-6] [326 IAC 2-2] [40 CFR 52.21]

Pursuant to 326 IAC 8-1-6, Best Available Control Technology (BACT) for the one (1) surface coating line has been determined to be:

- (a) The total VOC delivered to the applicators, including coatings, dilution solvents, and cleaning solvents, shall be limited to less than 187.4 tons per twelve (12) consecutive month period. Compliance with this limit renders the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable;
- (b) The method of application at the one (1) surface coating line shall be performed with high volume-low pressure (HVLP) spray applicators or the equivalent; and
- (c) The following management and work practices shall apply:
  - (1) Operator training course.
  - (2) Spray gun cleaning.
  - (3) The cleanup solvent containers used to transport solvent from drums/containers to work stations be closed containers having soft gasketed closures.
  - (4) The application equipment operators shall be instructed and trained on the methods and practices utilized to minimize spillage on the floor and over application.
  - (5) Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.
  - (6) Cleanup solvents will be reused in the process as much as possible to reduce hazardous waste and the related impact on the environment.

## D.3.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the PM from the one (1) surface coating line shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$ 

where E = rate of emission in pounds per hour; and

P = process weight rate in tons per hour

## D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the one (1) surface coating line and any control devices.

## **Compliance Determination Requirements**

## D.3.4 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitations contained in Condition D.3.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

## D.3.5 VOC Emissions

Compliance with Condition D.3.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

## D.3.6 Particulate Matter (PM)

In order to comply with Condition D.3.2, the wet scrubber for PM control shall be in operation and control emissions from the one (1) surface coating line at all times when the one (1) surface coating line is in operation.

## Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

## D.3.7 Parametric Monitoring

The Permittee shall record the flow rate and the total static pressure drop across the scrubber at least once per shift when the one (1) surface coating line is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise or unknown events for which response steps are subsequently devised, the flow rate shall be maintained within the range of 3,900 to 4,300 gallons per minute and the pressure drop across the scrubber shall be maintained within the range of 1 to 6 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

## D.3.8 Scrubber Inspection

An inspection shall be performed each calendar quarter of the scrubber. Defective scrubber part(s) shall be replaced. A record shall be kept of the results of the inspection.

## D.3.9 Failure Detection

In the event that a scrubber failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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## Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

## D.3.10 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.3.1.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.3.7, the Permittee shall maintain the following:
  - (1) Records of the following operational parameters once per shift during normal operation when venting to the atmosphere:
    - (A) Inlet and outlet differential static pressure; and
    - (B) Flow rate.
  - (2) Documentation of the dates vents are redirected.
- (c) To document compliance with Condition D.3.8, the Permittee shall maintain records of the results of the inspections required under Condition D.3.8.
- (d) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

## D.3.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE BRANCH

## PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Heartland Automotive, LLC

Source Address: 300 South Warren Drive, Greencastle, Indiana 46135

Mailing Address: P.O. Box 648, Greencastle, Indiana 46135

Part 70 Permit No.: T 133-12495-00027

		nall be included when submitting monitoring, testing reports/results or other documents as required by this permit.
	Please check what do	cument is being certified:
?	Annual Compliance Co	ertification Letter
?	Test Result (specify)	
?	Report (specify)	
?	Notification (specify)	
?	Affidavit (specify)	
?	Other (specify)	
	ertify that, based on inform he document are true, a	nation and belief formed after reasonable inquiry, the statements and information ccurate, and complete.
Sig	nature:	
Prir	nted Name:	
Titl	e/Position:	
Dat	te:	

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# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

## **COMPLIANCE BRANCH**

P.O. Box 6015 100 North Senate Avenue Indianapolis, Indiana 46206-6015 Phone: 317-233-5674 Fax: 317-233-5967

## PART 70 OPERATING PERMIT EMERGENCY OCCURRENCE REPORT

Source Name: Heartland Automotive, LLC

Source Address: 300 South Warren Drive, Greencastle, Indiana 46135

Mailing Address: P.O. Box 648, Greencastle, Indiana 46135

Part 70 Permit No.: T 133-12495-00027

## This form consists of 2 pages

Page 1 of 2

- ? This is an emergency as defined in 326 IAC 2-7-1(12)
  - ? The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
  - ? The Permittee must submit notice in writing or by facsimile within two **2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:

## Third Significant Permit Modification No.133-18195-00027 Revised by: EAL/MES

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Describe the cause of the Emergency:		

## Third Significant Permit Modification No.133-18195-00027 Revised by: EAL/MES

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f any of the following are not applicable, m	nark N/A	Page 2 of 2
Date/Time Emergency started:		
Date/Time Emergency was corrected:		
Was the facility being properly operated a Describe:	at the time of the emergency? Y N	
Type of Pollutants Emitted: TSP, PM-10,	, SO <sub>2</sub> , VOC, NO <sub>X</sub> , CO, Pb, other:	
Estimated amount of pollutant(s) emitted	during emergency:	
Describe the steps taken to mitigate the	problem:	
Describe the corrective actions/response	steps taken:	
Describe the measures taken to minimiz	e emissions:	
	ontinued operation of the facilities are necessary to ge to equipment, substantial loss of capital investreconomic value:	
Form Completed by:		
Title / Position:		
Date: _		
Phone:		

A certification is not required for this report.

Third Significant Permit Modification No.133-18195-00027 Revised by: EAL/MES Page 46 of 51 OP T 133-12495-00027

## Third Significant Permit Modification No.133-18195-00027 Revised by: EAL/MES

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# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE BRANCH

## Part 70 Quarterly Report

Source Name:	Heartland Automotive,	-
Source Mame.	Hearriand Allfomotive	11(.

Source Address: 300 South Warren Drive, Greencastle, Indiana 46135-0648

Mailing Address: P.O. Box 648, Greencastle, Indiana 46135-0648

Source Modification No.: 133-13901-00027

Facility: One (1) surface coating line

Parameter: Total VOC delivered to the applicators

Limit: Less than 187.4 tons per twelve (12) consecutive month period

YEAR: \_\_\_\_\_

VOC (tons)	VOC (tons)	VOC (tons)
This Month	Previous 11 Months	12 Month Total

?	No devi	ation occurred in this month.
?	Deviation/s occurred in this month.  Deviation has been reported on:	
Submit	ted by:	
Title/Po	-	
Signature:		
Date:		
Phone:		

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## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY **COMPLIANCE BRANCH**

## Part 70 Quarterly Report

Source Name:	Heartland Automotive, LLC	
Source marrie.	i leartiand Automotive. LLC	

Source Address: 300 South Warren Drive, Greencastle, Indiana 46135

Mailing Address: P.O. Box 648, Greencastle, Indiana 46135

Part 70 Permit No.: T 133-12495-00027

Facilities: Four (4) surface coating booths (WSB-1, WSB-2, SB-1 and SB-2)

Total VOC delivered to the applicators Parameter:

Limit: Less than 49.0 tons per twelve (12) consecutive month period

/EAR:	
-------	--

	VOC (tons)	VOC (tons)	VOC (tons)
Month	This Month	Previous 11 Months	12 Month Total
		<u> </u>	

	?	No deviation	occurred in	า this	month
--	---	--------------	-------------	--------	-------

?	Deviation/s occurred in this month.
	Deviation has been reported on:

Submitted by:	
•	

Title/Position:

Signature: Date:

Phone:

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE BRANCH

## Part 70 Quarterly Report

Source Name: Heartland Automotive, LLC

Source Address: 300 South Warren Drive, Greencastle, Indiana 46135

Mailing Address: P.O. Box 648, Greencastle, Indiana 46135

Part 70 Permit No.: T 133-12495-00027

Facility: Two (2) Surface Coating Booths (SB-1 and SB-2)

Parameter: Total HAPs delivered to the applicators

Limit: Single HAP less than ten (10) tons, combination HAPs less than twenty-five (25)

tons per twelve (12) consecutive month period

## YEAR:

Month	Single HAP (tons)	Combination of HAPs (tons)	Single HAP (tons)	Combination of HAPs (tons)	Single HAP (tons)	Combination of HAPs (tons)
	This Month	This Month	Previous 11 Months	Previous 11 Months	12 Month Total	12 Month Total

?	No deviation occurred in this month.				
?	Deviation/s occurred in this month.				
	Deviation has been reported on:				
Submit	ted by:				
	le/Position:				
Signatu	ıre:				
Date:	<u>-</u>				
Phone:	_				

## Third Significant Permit Modification No.133-18195-00027 Revised by: EAL/MES

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## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT **OFFICE OF AIR QUALITY COMPLIANCE BRANCH**

## **PART 70 OPERATING PERMIT** QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Heartland Automotive, LLC

Source Address: 300 South Warren Drive, Greencastle, Indiana 46135

Mailing Address: P.O. Box 648, Greencastle, Indiana 46135

Part 70 Permit No.: 1 133-12495-00027	
Months: to	Year:
	Page 1 of 2
shall be submitted quarterly based on a calendar year each deviation, the probable cause of the deviation Deviations that are required to be reported by an appropriate stated in the applicable requirement and do	all the requirements stated in this permit. This report ar. Any deviation from the requirements, the date(s) of n, and the response steps taken must be reported. Dicable requirement shall be reported according to the not need to be included in this report. Additional pages rred, please specify in the box marked "No deviations"
? NO DEVIATIONS OCCURRED THIS REPORTING	PERIOD.
? THE FOLLOWING DEVIATIONS OCCURRED THI	S REPORTING PERIOD
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

## Third Significant Permit Modification No.133-18195-00027 Revised by: EAL/MES

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				r age z c
Permit Requi	irement (specify	permit condition #)		
Date of Devia	ation:		<b>Duration of Deviation:</b>	
Number of De	eviations:			
Probable Cau	use of Deviatio	n:		
Response Ste	eps Taken:			
Permit Requi	irement (specify	permit condition #)		
Date of Devi	ation:		<b>Duration of Deviation:</b>	
Number of De	eviations:			
Probable Cau	use of Deviatio	n:		
Response Ste	eps Taken:			
Permit Requi	irement (specify	permit condition #)		
Date of Devia	ation:		<b>Duration of Deviation:</b>	
Number of De	eviations:			
Probable Cau	use of Deviatio	n:		
Response Ste	eps Taken:			
	? No dev	viation occurred in this	month.	
	? Deviat	on/s occurred in this m	nonth.	
	Deviat	on has been reported o	on:	
	Submitted by:			
	Title/Position:			
	Signature:			
	Date:			
	Phone:			

# Indiana Department of Environmental Management Office of Air Quality

## Technical Support Document (TSD) for a Part 70 Minor Source Modification and Significant Permit Modification

## **Source Background and Description**

Source Name: Heartland Automotive, LLC

Source Location: 300 South Warren Drive, Greencastle, Indiana 46135

County: Putnam SIC Code: 3089

Operation Permit No.: T 133-12495-00027
Operation Permit Issuance Date: June 14, 2001
Minor Source Modification No.: 133-18004-00027
Significant Permit Modification No.: 133-18195-00027

Permit Reviewer: Edward A. Longenberger

The Office of Air Quality (OAQ) has reviewed a modification application from Heartland Automotive, LLC relating to the construction and operation of the following emission units and pollution control devices:

Two (2) surface coating booths, identified as WSB-1 and WSB-2, equipped with HVLP spray applicators and a water curtain for PM overspray control, exhausted through Stack WS-1, capacity: 33 plastic instrument panels per hour.

## History

Heartland Automotive, LLC was issued a Part 70 permit on June 14, 2001. On September 19, 2003, Heartland Automotive, LLC submitted an application to the OAQ requesting to add two (2) spray booths to their existing plants. The proposed booths have potential VOC emissions less than twenty-five (25) tons per year. The source requests that the proposed new booths be limited under the existing limit of less than 49.0 tons of VOC per year for existing booths SB-1 and SB-2. The applicant is not requesting any increase in the permitted VOC emission limits.

## **Enforcement Issue**

There are no enforcement actions pending.

## **Stack Summary**

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (?F)
WS-1	WSB-1 and WSB-2	25.0	6.55	5300	70

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Minor Source Modification No.: 133-18004-00027 Significant Permit Modification No.: 133-18195-00027

## Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on September 19, 2003.

### **Emission Calculations**

See pages 1 and 2 of 2 of Appendix A of this document for detailed emissions calculations.

### **Potential To Emit of Modification**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	16.5
PM <sub>10</sub>	16.5
SO <sub>2</sub>	-
VOC	21.1
СО	-
NO <sub>X</sub>	-

HAPs	Potential To Emit (tons/year)
Glycol Ethers	1.20
Triethylamine	0.223
TOTAL	1.39

### **Justification for Modification**

The Part 70 Operating Permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(8), because the potential VOC

Minor Source Modification No.: 133-18004-00027 Significant Permit Modification No.: 133-18195-00027

emissions from the modification are less than twenty-five (25) tons per year but greater than ten (10) tons per year. The proposed operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification (SPM 133-18195-00027) in accordance with 326 IAC 2-7-12(b)(1)(E) and 326 IAC 2-7-12(d)(1). The Significant Permit Modification will give the source approval to operate the proposed emission units.

## **County Attainment Status**

The source is located in Putnam County.

Pollutant	Status
PM <sub>10</sub>	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
СО	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Putnam County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Putnam County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

## **Source Status**

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	21.5
PM <sub>10</sub>	22.6
SO <sub>2</sub>	0.144
VOC	249.33
СО	20.2
NO <sub>X</sub>	24.1

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pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.

(b) These emissions are based upon the Technical Support Document (TSD) for SSM 133-15489-00027.

### Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

		Potential to Emit of Modification (tons/year)					
Process/facility	PM	PM <sub>10</sub>	SO <sub>2</sub>	voc	СО	NO <sub>x</sub>	HAPs
Proposed Modification	16.7	16.7	-	0.00*	-	-	1.39
PSD Threshold Level	250	250	250	250	250	250	-

<sup>\*</sup> The VOC emissions from the proposed new spray booths (WSB-1 and WSB-2) shall be limited by the existing VOC limit of less than 49.0 tons per year for spray booths SB-1 and SB-2, which is contained in Condition D.1.2 of the Part 70 Operating Permit. Therefore, the increase in VOC emissions as a result of this modification is zero, for the purposes of PSD applicability.

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

## **Federal Rule Applicability**

- (a) This significant permit modification does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 for with the potential to emit before controls equal to or greater than the major source threshold for any criteria pollutants. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this modification.
- (b) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (c) The existing spray booths at this source which are engaged in the coating of plastic parts, as well as the proposed new spray booths at this source (WSB-1 and WSB-2), are subject to the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products, 40 CFR 63, Subpart PPPP. The U.S. EPA Administrator has signed and will publish a final Maximum Achievable Control Technology Standard (MACT) at 40 CFR 63, Subpart PPPP, for Surface Coating of Plastic Parts and Products. A copy of the signed version of the MACT is currently available on the U.S. EPA website, <a href="http://www.epa.gov/ttn/oarpg/t3pfpr.html">http://www.epa.gov/ttn/oarpg/t3pfpr.html</a>, and will be published in the Federal Register.

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326

Page 5 of 17 Minor Source Modification No.: 133-18004-00027 Significant Permit Modification No.: 133-18195-00027

IAC 20-1-1, apply to the affected source described in this section except when otherwise specified in 40 CFR 63 Subpart PPPP.

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This rule has a future compliance date; therefore, the specific details of the rule and how the Permittee will demonstrate compliance are not provided in the permit. The Permittee shall submit an application for a significant permit modification nine months prior to the compliance date for the MACT that will specify the option or options for the emission limitations and standards and methods for determining compliance chosen by the Permittee. At that time, IDEM, OAQ will include the specific details of the rule and how the Permittee will demonstrate compliance. In addition, pursuant to 40 CFR 63, Subpart PPPP, the Permittee shall submit:

- (1) An Initial Notification containing the information specified in 40 CFR 63.9(b)(2) no later than 120 days after the effective date of 40 CFR 63, Subpart PPPP.
- (2) A Notification of Compliance Status containing the information required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to your affected source.

## State Rule Applicability - Individual Facilities

326 IAC 2-2 (Prevention of Significant Deterioration)

The VOC emissions from the proposed spray booths (WSB-1 and WSB-2) shall be limited under the existing VOC limitations for SB-1 and SB-2. Therefore, there is no increase in potential VOC emissions, and this source remains a minor source with respect to 326 IAC 2-2.

326 IAC 2-4.1 (New source toxics control)

The potential to emit HAPs from the proposed spray booths (WSB-1 and WSB-2) are less than ten (10) tons per year for the worst case single HAP, and less than twenty-five (25) tons per year for total HAPs. Therefore, the requirements of 326 IAC 2-4.1 do not apply.

326 IAC 6-3-2 (Process Operations)

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirements from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirements until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) from the two (2) spray booths (WSB-1 and WSB-2) shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$  where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

Under the rule revision, particulate from the two (2) spray booths (WSB-1 and WSB-2) shall be

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controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The proposed spray booths shall be limited under the existing BACT limit of less than 49.0 tons per year for spray booths SB-1 and SB-2. There will be no increase in VOC emissions due to this modification, therefore, the requirements of 326 IAC 8-1-6 are satisfied.

## **Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this modification are as follows:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booths Stack WS-1 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C Compliance Monitoring Plan Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the water curtain for the surface coating booths

Minor Source Modification No.: 133-18004-00027 Significant Permit Modification No.: 133-18195-00027

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must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

## **Proposed Changes**

The permit language is changed to read as follows (deleted language appears as strikeouts, new language appears in **bold**):

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) door panel assembly line, identified as VF/EF/HS, consisting of three (3) processes, vacuum forming, exhausted through Stack C-1, edge folding, exhausted through Stack C-2, both installed in May 1989, and hot stake, exhausted through Stack C-3, installed in February 1999, capacity: 150 door panels per hour.
- (b) Two (2) surface coating booths, identified as SB-1 and SB-2, installed in 1999, equipped with HVLP spray applicators and dry filters for PM overspray control, exhausted through Stacks SB-1 and SB-2, capacity: 62.5 plastic automotive parts per hour.
- (c) Two (2) surface coating booths, identified as WSB-1 and WSB-2, equipped with HVLP spray applicators and a water curtain for PM overspray control, exhausted through Stack WS-1, capacity: 33 plastic instrument panels per hour.
- (d e) One (1) adhesive application booth, identified as AB-1, installed in 2000, equipped with HVLP spray applicators and dry filters for PM overspray control, exhausted through Stack C-4, capacity: 250 plastic automotive parts per hour.
- (e d) One (1) touch-up paint booth, identified as TPB exhausted through Stack D, installed in 1997, capacity: 13.89 plastic automotive parts per hour.
- (f e) One (1) surface coating line, with a capacity of 57.7 vehicles per hour, consisting of three (3) spray booths in series, using high-volume low-pressure (HVLP) spray equipment, equipped with a wet scrubber for overspray control and exhausting to Stacks S-4 through S-7.

Heartland Automotive, LLC Page 9 of 17
Greencastle, Indiana Minor Source Modification No.: 133-18004-00027

Permit Reviewer: EAL/MES Significant Permit Modification No.: 133-18195-00027

## SECTION D.1

## **FACILITY OPERATION CONDITIONS**

## Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) door panel assembly line, identified as VF/EF/HS, consisting of three (3) processes, vacuum forming, exhausted through Stack C-1, edge folding, exhausted through Stack C-2, both installed in May 1989, and hot stake, exhausted through Stack C-3, installed in February 1999, capacity: 150 door panels per hour.
- (b) Two (2) surface coating booths, identified as SB-1 and SB-2, installed in 1999, equipped with HVLP spray applicators and dry filters for PM overspray control, exhausted through Stacks SB-1 and SB-2, capacity: 62.5 plastic automotive parts per hour.
- (c) Two (2) surface coating booths, identified as WSB-1 and WSB-2, equipped with HVLP spray applicators and a water curtain for PM overspray control, exhausted through Stack WS-1, capacity: 33 plastic instrument panels per hour.
- (d e) One (1) adhesive application booth, identified as AB-1, installed in 2000, equipped with HVLP spray applicators and dry filters for PM overspray control, exhausted through Stack C-4, capacity: 250 plastic automotive parts per hour.
- (e d) One (1) touch-up paint booth, identified as TPB exhausted through Stack D, installed in 1997, capacity: 13.89 plastic automotive parts per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

## Emission Limitations and Standards [326 IAC 2-7-5(1)]

## D.1.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 12 to 40 CFR Part 63, Subpart PPPP] [40 CFR 63.2398]

- (a) The provisions of 40 CFR Part 63, Subpart A General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart PPPP. The Permittee must comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

## D.1.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482]

(a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at http://www.epa.gov/ttn/atw/plastic/plasticpg.html. Pursuant to 40 CFR 63.4483(b),

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the Permittee must comply with these requirements on and after the date 3 years after the effective date of 40 CFR Part 63, Subpart PPPP.

- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:
  - (1) All coating operations as defined in 40 CFR 63.4581;
  - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, which are incorporated by reference.

## D.1.31 Volatile Organic Compounds [326 IAC 8-1-6]

- (a) Pursuant to 326 IAC 8-1-6, Best Available Control Technology (BACT) for the **four** two (4 2) surface coating booths (**WSB-1**, **WSB-2**, SB-1 and SB-2) has been determined to be:
  - (1) The total VOC delivered to the applicators, including coatings, dilution solvents, and cleaning solvents, shall be limited to less than 49.0 tons per twelve (12) consecutive month period;
  - The method of application at the **four two** (**4** 2) surface coating booths (**WSB-1**, **WSB-2**, SB-1 and SB-2) shall be performed with high volume-low pressure (HVLP) spray applicators or the equivalent; and
  - (3) The following management and work practices shall apply:
    - (A) Operator training course.
    - (B) Spray gun cleaning.
    - (C) The cleanup solvent containers used to transport solvent from drums/ containers to work stations be closed containers having soft gasketed closures.
    - (D) The application equipment operators shall be instructed and trained on the methods and practices utilized to minimize spillage on the floor and over application.

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(E) Storage containers used to store VOC containing materials shall be kept covered when not in use.

- (F) Cleanup solvents will be reused in the process as much as possible to reduce hazardous waste and the related impact on the environment.
- (b) Any change or modification which would increase the potential to emit VOC from the adhesive application booth, known as AB-1, to twenty-five (25) tons per year or more, shall obtain prior approval from IDEM. OAQ.

## D.1.42 HAPs [326 IAC 2-4.1-1]

- (a) The total amount of any single HAP and combination of HAPs delivered to the applicators of the two (2) surface coating booths (SB-1 and SB-2) shall be limited to less than ten (10) and less than twenty-five (25) tons per twelve (12) consecutive month period, respectively. Therefore, the requirements of 326 IAC 2-4.1-1 (New source toxics control) do not apply.
- (b) Any change or modification which would increase the potential to emit a single HAP or a combination of HAPs from the adhesive application booth, known as AB-1, **or the two (2) spray booths (WSB-1 and WSB-2)** to ten (10) tons per year or more or twenty-five (25) tons per year or more, respectively, shall obtain prior approval from IDEM, OAQ.

## D.1.53 Particulate Matter (PM) [326 IAC 6-3-2]

The PM from the door panel assembly line (VF/EF/HS), the touch-up paint booth (TPB), the adhesive application booth (AB-1), **the two (2) surface coating booths (WSB-1 and WSB-2),** and the two (2) surface coating booths (SB-1 and SB-2) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$  where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

### D.1.**64** Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the adhesive application booth (AB-1), **the two (2) surface coating booths (WSB-1 and WSB-2)**, **the** two (2) surface coating booths (SB-1 and SB-2) and any control devices.

## **Compliance Determination Requirements**

## D.1.75 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

Compliance with the VOC and HAPs usage limitations contained in Conditions D.1.31 and D.1.42 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

## D.1.86 VOC Emissions

Compliance with Condition D.1.34 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

## D.1.97 HAPs Emissions

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Compliance with Condition D.1.42 shall be demonstrated within 30 days of the end of each month based on the HAPs usage for the most recent twelve (12) month period.

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## Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

## D.1.108 Particulate Matter (PM)

(a) In order to comply with Condition D.1.53, the dry filters for PM overspray control shall be in operation at all times when the adhesive application booth (AB-1) and the two (2) surface coating booths (SB-1 and SB-2) are in operation.

(b) In order to comply with Condition D.1.5, the water curtain for PM overspray control shall be in operation at all times when the two (2) surface coating booths (WSB-1 and WSB-2) are in operation.

## D.1.119 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks C-4, WS-1, SB-1 and SB-2 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C Compliance Monitoring Plan Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C Compliance Monitoring Plan Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) The Permittee shall record the flow rate of the water curtain at least once per shift when the one (1) surface coating line is in operation. When for any one reading, the flow rate of the water curtain is outside the normal range of 190 and 232 gallons of water per minute or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Monitoring Plan Failure to Take Response Steps. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C Compliance Monitoring Plan Failure to Take Response Steps, shall be considered a violation of this permit.
- (d e) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

## Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

## D.1.**12**10 Record Keeping Requirements

(a) To document compliance with Conditions D.1.31 (a) and (b) and D.1.42 (a) and (b), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and usage requirements and/or the VOC and HAPs emission limits and emission requirements established in Conditions D.1.31 and D.1.42.

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> The amount of VOC in each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between

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- (2) A log of the dates of use;
- The cleanup solvent usage for each month; (3)
- (4) The total VOC usage for each month; and
- (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Conditions D.1.108 and D.1.119, the Permittee shall maintain once per shift records of the water curtain flow rate, a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

those added to coatings and those used as cleanup solvents;

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## D.1.131 Reporting Requirements

(1)

A quarterly summary of the information to document compliance with Conditions D.1.34(a) and D.1.42(a) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## D.1.14 Notification Requirements [40 CFR 63.4510]

- General. You must submit the notifications in 40 CFR 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to you by the dates specified in those sections, except as provided in paragraphs (b) and (c) of this section.
- (b) Initial notification. You must submit the initial notification required by 40 CFR 63.9(b) for a new or reconstructed affected source no later than 120 days after initial startup or 120 days after the effective date of 40 CFR Part 63, Subpart PPPP, whichever is later. (For an existing affected source) you must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart PPPP. If you are using compliance with the Automobiles and Light-Duty Trucks NESHAP (subpart IIII of this part) under 40 CFR 63.4881(d) to constitute compliance with this subpart for your plastic part coating operations, then you must include a statement to this effect in your initial notification and no other notifications are required under this subpart. If you are complying with another NESHAP that constitutes the predominant activity at your facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for your plastic coating operations, then you must include a statement to this effect in your initial notification and no other notifications are required under this subpart.
- (c) Notification of compliance status. You must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to your affected source. The notification of compliance status

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must contain the information specified in 40 CFR 63.4510, paragraphs (c)(1) through (11) and in 40 CFR 63.9(h).

## D.1.15 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12] [326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than twenty-seven months after the effective date of 40 CFR 63, Subpart PPPP.
- (c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

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# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE BRANCH

## Part 70 Quarterly Report

Source Name:	Heartland Automotive.	110
Source marrie.	nearliand Automotive.	LLU

Source Address: 300 South Warren Drive, Greencastle, Indiana 46135

Mailing Address: P.O. Box 648, Greencastle, Indiana 46135

Part 70 Permit No.: T 133-12495-00027

Facilities: Four two (4 2) surface coating booths (WSB-1, WSB-2, SB-1 and SB-2)

Parameter: Total VOC delivered to the applicators

Limit: Less than 49.0 tons per twelve (12) consecutive month period

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	VOC (tons)	VOC (tons)	VOC (tons)	
Month	This Month	Previous 11 Months	12 Month Total	

- ? No deviation occurred in this month.
- ? Deviation/s occurred in this month.

Deviation has been reported on:

Submitted by:

Title/Position:

Signature:

Date:

Phone:

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## Conclusion

The construction and operation of this proposed modification shall be subject to the conditions of the attached Part 70 Minor Source Modification No. **133-18004-00027** and Part 70 Significant Permit Modification No. **133-18195-00027**.